

Metabolife

January 31, 2000

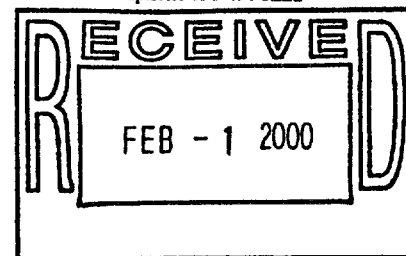
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Metabolife International, Inc.
5070 Santa Fe Street
San Diego, California 92109

Telephone 858 490 5222

VIA FACSIMILE (202-205-5295) AND FIRST CLASS MAIL

Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C. St., SW
Washington, DC 20204

**Re. Statement of Nutritional Support Notifications**

To Whom It May Concern:

We are hereby informing you that Metabolife International, Inc. ("Metabolife") has initiated the marketing of five new dietary supplement products that require the submission of notifications to the FDA under 21 C.F.R. § 101.93.

The first product, marketed under the trade name ChinacTM Immune Health Formula, contains the following herbal ingredients: Honeysuckle, Forsythia, Isatis, Astragalus, Chinese peony and Blackberry lily. The following labeling claims are made for the product:

- (1) provides herbal support during the cold and flu season
- (2) formulated to maintain Chi - enhancing your body's natural health-providing capabilities and supporting its inner balance.

The second product, marketed under the trade name ChinacTM Digestive Health Formula, contains the following herbal ingredients: Job's tears, Poria, Chinese hawthorn, Chinese anemum, Sweet wormwood, Xanthium, Rice and Apricot. The following labeling claims are made for the product:

- (1) formulated to help maintain proper stomach function
- (2) ideal for use with spicy or hard-to-digest foods
- (3) formulated to maintain Chi - supporting your body's natural ability to maintain its inner balance
- (4) stimulates Yang and help maintain easy and natural functions of the digestive organs.

The third product, marketed under the trade name ChinacTM Stress and Tension Formula, contains the following herbal ingredients: Burdock, Sichuan lovage, Corydalis yanhusuo, Fragrant angelica and Siler. The following labeling claims are made for the product:

- (1) supports the function of pain-mediating receptors in the head and neck
- (2) formulated to maintain Chi - enhancing your body's natural health-providing capabilities and maintaining inner balance.

Doc. 507821

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97S-0162

Also see docket 97S-0163

LET 4939

The fourth product, marketed under the trade name ChinacTM Menstrual Health Formula, contains the following herbal ingredients: Chinese motherwort, Corydalis yanhusuo, Dong Quai, Lindera and Cyperus. The following labeling claims are made for the product:

- (1) helps provide support before and during menstruation
- (2) helps provide support for the common discomforts associated with PMS and menstruation
- (3) time tested ingredients to balance Yin, the female essence
- (4) formulated to maintain Chi - supporting your body's natural ability to maintain its inner balance.

The fifth product, marketed under the trade name ChinacTM Joint Health Formula, contains the following herbal ingredients: Coral-tree, Bai-zhu atractylodes, Wen curcuma, Notopterygium, Pubescent angelica and Achyranthos. The following labeling claims are made for the product:

- (1) supports healthy flexibility and mobility for your daily activities
- (2) formulated to maintain Chi - enhancing your body's natural health-providing capabilities and support its inner balance
- (3) maintains comfort and flexibility in the joints.

Metabolife's address is: 5070 Santa Fe Street, San Diego, California, 92109.

I hereby certify that the information contained in this notice is complete and accurate, and that Metabolife has substantiation that the statements are truthful and not misleading.

Sincerely,



David Gummer
Director of Marketing
Metabolife International, Inc.